

1593154M10/dms/092424/btc/092424

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	BANKRUPTCY NO. 21-21712-CMB
	:	
EUSTACE O. UKU,	:	
	:	Chapter 13
Debtor.	:	
	:	
EUSTACE O. UKU,	:	
	:	
Movant.	:	
	:	
vs.	:	
	:	
CHARLES A. KNOLL, JR.,	:	
	:	
Creditor.	:	

CREDITOR, CHARLES A. KNOLL, JR., MOTION TO ATTEND SEPTEMBER 30, 2024
HEARING REMOTELY OR ALTERNATIVELY TO RESCHEDULE DUE TO
PHYSICAL HARDSHIP

AND NOW, comes Creditor, Charles A. Knoll by and through his counsel, David M. Nernberg and Nernberg & Associates, and files this Motion to Attend September 30, 2024 Hearing Remotely or Alternatively to Reschedule Due to Physical Hardship.

INTRODUCTION:

1. On August 5, 2024 the Court scheduled an evidentiary hearing as to why this Bankruptcy should not be dismissed or otherwise converted.

2. The Court continued the hearing until September 30, 2024 and required both Creditor, Charles A. Knoll, Jr. and Debtor, Eustace O. Uku to attend the evidentiary hearing in person.

3. While Knoll's attorneys are able to attend the September 30, 2024 hearing, Knoll has suffered a physical hardship that renders him unable to attend any in person hearing.

4. Knoll has been advised that this hardship will continue for a minimum of 8 to 10 days from the date of this filing.

5. Given the delay in these proceedings Knoll requests this Court to allow him to attend the September 30, 2024 hearing virtually or alternatively, to reschedule the September 30, 2024 hearing to allow two weeks for Knoll's recovery. Knoll is not requesting to reschedule any other events and his counsel intends to attend the hearing scheduled for September 26, 2024 relating to documents not produced by Uku pursuant to this Court's September 11, 2024 text order.

WHEREFORE, Charles A. Knoll, Jr. requests that this Honorable Court enter an Order consistent with the relief requested in Paragraph 5 of this Motion and enter any other relief this Court deems appropriate.

Respectfully Submitted,
MAURICE A. NERNBERG & ASSOCIATES

Date: September 24th, 2024

By: /s/ David M. Nernberg
David M. Nernberg
Pa. I.D. No. 205631

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Counsel for Charles A. Knoll, Jr.

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CHARLES A. KNOLL, Jr., :
:
Creditor. :

ORDER OF COURT

AND NOW, this __ day of _____, 2024, it is Ordered, Adjudged and Decreed
that:

- Charles A. Knoll, Jr. may attend the September 30, 2024 evidentiary hearing remotely via this Court's Zoom procedures.

Alternatively

- The September 30, 2024 Evidentiary Hearing is continued to _____, 2024 with the Debtor, Eustace O. Uku and Creditor, Charles A. Knoll, Jr. required to attend in person.

BY THE COURT:

Honorable Carlota M. Böhm
United States Bankruptcy Judge